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Counsel to Creditor Linus Financial, Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: :
: Case No.: 22-10964 (MG)
CELSIUS NETWORK LLC, *et al.*, :
: Chapter 11
Debtors. :
:
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**NOTICE OF WITHDRAWAL OF CLAIM NOS. 32711, 32722 & 32810, BUT NOT
CLAIM NO. 17272, FILED BY LINUS FINANCIAL, INC., MATTHEW NEMER,
ANTHONY MICHAEL GARCIA, JR., AND VAIBHAV PURANIK**

Creditors and parties in interest Linus Financial, Inc. (“Linus”), Matthew Nemer, Anthony Michael Garcia, Jr. and Vaibhav Puranik (Mr. Nemer, Mr. Garcia and Mr. Puranik together, the “Linus Shareholders”), file this notice of withdrawal (“Withdrawal Notice”) of Claim Nos. 32711, 32722 & 32810, but not Claim No. 17272, subject to and for the reasons explained further below.

1. On January 3, 2023, Linus timely filed Claim No. 17272 in the amount of \$683,230.27 (the “Linus Claim”) against debtor Celsius US Holding LLC (the “Debtor”) for, among other things, hold-back amounts owed to Linus by the Debtor pursuant to a certain asset purchase agreement between Linus and the Debtor.

2. After the Linus Claim was filed, in or around November 2023, Linus began the process of winding down and dissolving. In connection with that dissolution process, Linus notified its shareholders that it intended to distribute the Linus Claim pro rata to its shareholders

and suggested that each shareholder file a notice of claim transfer for its pro rata portion of the Linus Claim.

3. Following that suggestion from Linus, the Linus Shareholders filed Claim Nos. 32711, 32722 and 32810 (the “Linus Shareholder Claims”) for their respective pro rata portion of the Linus Claim based on their pro rata ownership interest in Linus.

4. To date, neither Linus nor the Linus Shareholders have received a distribution on the Linus Claim or the Linus Shareholder Claims.

5. When counsel for Linus contacted counsel for the Debtor to determine why Linus and the Linus Shareholders had not yet received a distribution, counsel for Linus was told that a distribution could not be made because Linus and the Linus Shareholders filed competing claims and that would need to be resolved before a distribution could be made.

6. To resolve this issue, counsel for Linus suggested the Linus Shareholders withdraw the Linus Shareholder Claims so a single distribution could be made to Linus, which Linus would then distribute pro rata to its shareholders, including the Linus Shareholders.

7. Counsel for the Debtor indicated that if the Linus Shareholders withdrew the Linus Shareholders Claims, that should resolve the issue so a single distribution could be made to Linus.

8. Accordingly, subject to the foregoing, Linus and the Linus Shareholders file this Withdrawal Notice to withdraw the Linus Shareholder Claims, but not the Linus Claim, so a distribution can be made to Linus on the Linus Claim.

Dated: New York, New York
July 24, 2024

Respectfully submitted,

BAKER & HOSTETLER LLP

By: /s/ Jorian L. Rose
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Counsel for Creditor Linus Financial, Inc.

Consented to by:

/s/ Matthew Nemer (email consent 7.17.24)
Matthew Nemer
Linus Shareholder, Claim No. 32711

/s/ Anthony Michael Garcia, Jr. (email consent 7.17.24)
Anthony Michael Garcia, Jr.
Linus Shareholder, Claim No. 32772

/s/ Vaibhav Puranik (email consent 7.23.24)
Vaibhav Puranik
Linus Shareholder, Claim No. 32810